

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE TERRORIST ATTACKS ON SEPTEMBER 11, 2001	Civil Action No. 03 MDL 1570 (GBD)(FM)
--	---

This document relates to:

Thomas E. Burnett, Sr., et al. v. Islamic Republic of Iran, Case No. 1:15-cv-9903 (GBD)(SN)
(S.D.N.Y.)

PLAINTIFFS' NOTICE OF MOTION TO AMEND

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and Exhibit A attached hereto, the plaintiffs identified on Exhibit A respectfully move this Court pursuant to Fed. R. Civ. P. 15 and 17 for an Order permitting them to amend the caption of Plaintiffs' Amended Complaint to incorporate the multiple capacities in which the plaintiffs identified on Exhibit A seek to proceed in this action. This motion does not add the claims of any new real parties in interest but rather more appropriately identifies those real parties in interest who are already named in Plaintiffs' Amended Complaint who are proceeding in multiple capacities that may not have previously been clear in the pleadings.

Dated: January 13, 2020

Respectfully submitted,

/S/ John M. Eubanks

Robert T. Haefele, Esq. (NY 845666; SC
75266, DC 1007583, NJ 58293, PA 57937)
John M. Eubanks, Esq. (SC 79816; MD [no bar
numbers assigned])
MOTLEY RICE LLC
28 Bridgeside Boulevard
Mount Pleasant, South Carolina 29464
Telephone: (843) 216-9000

Attorneys for the Burnett Plaintiffs